

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

CRUZ BAYLON and
MARIA CARMEN BAYLON,

Plaintiffs,

v.

No. 1:12-cv-00052-MCA-KBM

WELLS FARGO BANK, N.A.; and
MCCARTHY & HOLTHUS, LLP
d/b/a MCCARTHY, HOTHUS & LEVINE,

Defendants.

**PLAINTIFFS' SECOND MOTION TO COMPEL
WELLS FARGO TO ANSWER WRITTEN DISCOVERY**

Plaintiffs Cruz and Maria Carmen Baylon move the Court to compel Defendant Wells Fargo Bank, N.A. ("Wells Fargo") to answer written discovery. Wells Fargo opposes this motion.

Prior to filing this motion, the Baylons attempted to resolve these discovery disputes. By letter and by telephone, the parties conferred concerning the dispute. Wells Fargo refused to respond to Plaintiffs' letter, refused to supplement its written responses, and refused to produce the majority of the requested documents.

The Baylons sets forth more fully their grounds for this motion in the brief that they file in support of this motion.

The Baylons request that the Court order Wells Fargo to provide full and complete responses to Interrogatories No. 10, 11, 15, and 17-19, and Requests for Production Nos. 3, 7-10, and 13-15, and Requests for Admission Nos. 1, 2 and 4, within 10 days of the entry of the Court's order.

Respectfully submitted,

FEFERMAN & WARREN, attorneys for Plaintiffs

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